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E-Filed 3-1-12

7 UNITED STATES BANKRUPTCY COURT  
8 DISTRICT OF NEVADA

9 In re:

Case No. BK-S-11-10391-BAM  
Chapter 11

10 JOHN E. HARNEY, IV. and AIMEE M.  
11 HARNEY,

Date: (OST)

Time: (OST)

12 Debtors.

Estimated Time: 5 minutes

13 **EX PARTE APPLICATION FOR ORDER SHORTENING TIME ON MOTION FOR**  
14 **RELIEF FROM THE AUTOMATIC STAY**

15 Martin Keough ("Keough"), by and through his counsel of record Ty E. Kehoe, Esq.,  
16 hereby submits his Ex Parte Application for an Order Shortening Time on Motion for Relief  
17 from the Automatic Stay.

18 This Application is made pursuant to Local Rule 9006, and is based on Keough's  
19 Motion for Relief from the Automatic Stay ("Motion"), filed simultaneously herewith, the  
20 pleadings, papers and records on file in this matter and the following grounds:

- 21
- 22 a. Debtor has been in Bankruptcy for over one year and has not made a
- 23 single payment to Keough during that time, even though Debtor has been
- 24 collecting \$1,000 per month from the Real Property rental. Additionally,
- 25 the Debtor has not paid the taxes on the Real Property, and upon
- 26 information and belief has recently permitted the insurance to lapse.
- 27

- Therefore, Keough requests that the Motion be set on OST for March 20, 2012 at 9:00

**KEHOE & ASSOCIATES**

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